

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF ARKANSAS  
JONESBORO DIVISION

OLD ST. PAUL MISSIONARY  
BAPTIST CHURCH

PLAINTIFF

V.

NO. 3:07-cv-00043 WRW

FIRST NATION INSURANCE GROUP;  
AA RISK MANAGEMENT, INC.;  
AA COMMUNICATIONS, INC.;  
GWEN MOYO; CRAIG GREENE;  
JOHN DOES 1-10;  
DOE COMPANIES 1-10

DEFENDANTS

**MOTION TO ENLARGE TIME**

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COME NOW the Defendants, First Nation Insurance Group, AA Risk Management, Inc., AA Communications, Inc., Gwen Moyo and Craig Greene, by and through counsel, and move, for cause shown and pursuant to F.R.C.P. 6(b), that the time for them to answer or respond to Plaintiff's Motion to Strike Defendants' Answer and Notice of Removal, Objection to Removal and Motion to Remand be extended by thirty days (30) from the date of the entry of an Order adjudicating the Joint Motion for Leave to Withdraw as Counsel filed contemporaneously herewith.

WHEREFORE, the Defendants, First Nation Insurance Group, AA Risk Management, Inc., AA Communications, Inc., Gwen Moyo and Craig Greene, request that this motion be granted and that the time for each of them to respond to the Plaintiff's Motion to Strike Defendants' Answer and Notice of Removal, Objection to Removal, and Motion to Remand be enlarged as requested herein.

Respectfully,

HARDIN & GRACE, P.A.  
Attorneys for Defendants  
500 Main Street, Suite A  
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North Little Rock, AR 72119-5851  
Telephone: (501) 378-7900  
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By: /s/David A. Grace

David A. Grace  
State Bar No. 76-044

AND

LESS, GETZ & LIPMAN  
Attorney for Defendants  
100 Peabody Place, Suite 1150  
Memphis, Tennessee 38103  
Telephone: (901) 525-8700  
Facsimile: (901) 525-3569

By: /s/Justin R. Giles, III

Justin R. Giles, III  
TN Bar No. 24123

**CERTIFICATE OF SERVICE**

I hereby certify that on May 15, 2007, I electronically filed the foregoing with the Clerk of the Court using the ECF system which sent notification to:

Mr. Lawrence W. Jackson  
RIEVES, RUBENS & MAYTON  
P.O. Box 1359  
West Memphis, AR 72303

I hereby certify that a copy of the foregoing was served on the non-ECF participants, First Nation Insurance Group, AA Risk Management, Inc., AA Communications, Inc., Gwen Moyo and Craig Greene, via U.S. Mail, Certified Mail, Return Receipt Requested, postage prepaid, this 15<sup>th</sup> day of May, 2007, to the following addresses:

Gwen Moyo  
8000 GSRI Avenue  
Building 3000, Room 128  
Baton Rouge, LA 70820

AA Communications, Inc.  
261 Oakmont Drive  
New Orleans, LA 70128

AA Risk Management, Inc.  
261 Oakmont Drive  
New Orleans, LA 70128

Craig Greene c/o Thomas Shahady  
Adorno & Yoss LLP  
350 East Las Olas Blvd., Suite 1700  
Ft. Lauderdale, FL 33301

First Nation Insurance Group  
4544 Sheppard Avenue East, Suite 130  
Toronto, Ontario M1S 1V2, Canada

/s/Justin R. Giles, III  
JUSTIN R. GILES, III